

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
Wireless Backhaul: Further Inquiry Into)	
Fixed Service Sharing of the 6875-7125)	WT Docket No. 10-153
MHz and 12700-13200 MHz Bands)	
)	

COMMENTS OF SIRIUS XM RADIO INC.

Sirius XM Radio Inc. (“Sirius XM”) hereby responds to the Commission’s recent Public Notice seeking comment on its proposal to promote wireless backhaul services in the 7 GHz and 13 GHz bands.¹

In proposing to expand the use of the 6875-7125 MHz (“7 GHz”) and 12700-13200 MHz (“13 GHz”) bands by Part 101 microwave services, the *Backhaul Public Notice* appropriately reiterates the Commission’s intention “to protect existing licensees, through the use of existing frequency coordination procedures.”² However, the *Backhaul Public Notice*’s discussion of incumbent services to be protected fails to include any reference to the co-primary allocation to the Fixed Satellite Service (“FSS”) in both bands.

Existing Commission rules allocate portions of the spectrum bands under consideration in this proceeding for Earth-to-space fixed satellite operations on a co-primary basis.³ Pursuant to

¹ See Wireless Backhaul: Further Inquiry Into Fixed Service Sharing of the 6875-7125 MHz and 12700-13200 MHz Bands, WT Docket No. 10-153, *Public Notice*, DA 11-1011 (rel June 7, 2011) (“*Backhaul Public Notice*”).

² *Id.* at 1 ¶ 2 (*citing* Amendment of Part 101 of the Commission’s Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licensees, WT Docket No. 10-153, *Notice of Proposed Rulemaking and Notice of Inquiry*, 25 FCC Rcd 11246, 11254 ¶ 17 (2010) (“*Wireless Backhaul NPRM/NOI*”).

³ See Comments of Sirius XM Radio Inc., WT Docket Nos. 10-153, 09-106, 07-121 at 2 (filed Oct. 25, 2010) (“Sirius XM Comments”); *see also* 47 C.F.R. § 2.106 (showing “FIXED-

those rules, Sirius XM operates feeder links in the 6875-7125 MHz band, which it uses to uplink digital radio transmissions to its satellites for retransmission to its over 20 million subscribers.

Any effort to expand the use of these bands for wireless backhaul services must provide continued protection to co-primary satellite operations. Because the *Wireless Backhaul NPRM/NOI* expressly acknowledged the sharing between Part 101 licensees and Part 25 FSS licensees,⁴ the *Backhaul Public Notice*'s failure to address this usage suggests that the Commission intends no changes to the current requirements protecting FSS. Furthermore, Sirius XM previously discussed how frequency coordination can help ensure that new Part 101 operations can share this band without any increased potential for interference.⁵ However, to avoid any confusion, the Commission should clearly reaffirm the co-primary status of FSS operations in these bands and the applicability of the existing frequency coordination rules.

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SATELLITE (Earth-to-space)” allocations at 6875-7025 MHz, 7025-7075 MHz, 12.7-12.75 GHz, and 12.75-13.25 GHz).

⁴ *Wireless Backhaul NPRM/NOI*, 25 FCC Rcd at 11250 ¶ 8.

⁵ See Sirius XM Comments at 3 (*citing* 47 C.F.R. §§ 25.203, 101.103).